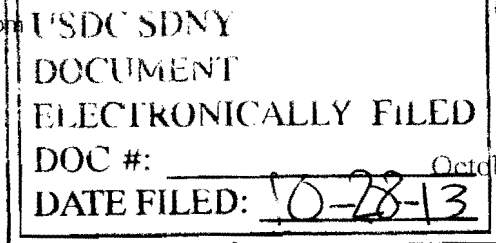


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BY FAX

The Honorable Robert W. Sweet, U.S.D.J.
Unites States Courthouse
500 Pearl Street
New York, New York 10007

Re: Halpert v. Manhattan Apartments, Inc., Case No. 1:04-CV-01850

Dear Judge Sweet:

We represent Defendant in connection with the above-referenced matter. I write to advise the Court that, for the reasons discussed below, we intend to request to be relieved from our representation of Defendant. Plaintiff's counsel recently entered their appearance (Plaintiff had previously been pro se for much of the litigation), a status conference before Your Honor is scheduled for October 28, 2013.

Since this matter became active again over the past several months, I have attempted to contact Jerry Weinstein, President of Manhattan Apartments, without success. Mr. Weinstein has been the only contact I have at the company since the departure of the company's general counsel in or around 2005. As explained in my declaration, I have tried to make contact by email and telephone, using the contact information I have used in the past. My email messages did not bounce back and I was able to leave voice mail messages, but all messages have been unreturned. I also personally visited the office that had been that of Manhattan Apartments on October 1, but the office is now occupied by AC Lawrence, another real estate company. I left my card with an individual at the office who said he knew Mr. Weinstein personally, but Mr. Weinstein has not contacted me.

According to articles I have located on the internet, Manhattan Apartments ceased operations earlier this year and many brokers, possibly including Mr. Weinstein, went to work for AC Lawrence. I do not know the details of any such arrangement, but I was advised by a representative of AC Lawrence in that office that Manhattan Apartments is not part of AC Lawrence, and Manhattan Apartments is still listed as an active corporation in the Secretary of State's database of New York corporations.

I intend to send a copy of this letter to Manhattan Apartments both at its last known address and at the address listed with the Secretary of State. Those are the only addresses I have for the corporation or Mr. Weinstein. I would be happy to continue representing Manhattan Apartments in this action if Mr. Weinstein or someone else from Manhattan Apartments would

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Gehring & Satriale LLC

The Honorable Robert W. Sweet, U.S.D.J.

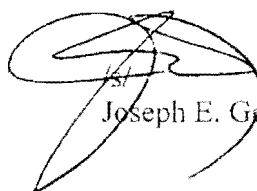
October 24, 2013

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establish contact, but I do not feel I can adequately represent Manhattan Apartments without the corporation's cooperation. As I stated above, we are scheduled to appear before Your Honor for a status conference on October 28, 2013.

Thank you for your continued attention in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "J. Gehring, Jr.", written over a horizontal line.

Joseph E. Gehring, Jr.

cc: Jyotin Hamid, Esq.
(by email)

Jerry Weinstein
President, Manhattan Apartments, Inc.
(by Federal Express)